

### **REMARKS**

Claims 1-9, 11-24, 26-42 and 44-56 are currently pending in the application. By this response, claims 1, 19 and 39 have been amended for clarity, without acquiescence or prejudice to pursue the original claims in a related application. No new matter has been added. Support for the amendments can be found at least in page 6, line 7 to page 9, line 23 and page 30, line 5 to page 39, line 2 in the specification as originally filed.

#### **Claim Objections**

Claim 1 is objected to for informalities. The claim has been corrected as suggested by the Office action. Thus, this objection is now moot.

#### **Claim Rejections - 35 USC § 103**

Claims 1, 54-56 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Cohen et al. (US 6,178,511B1) in view of Moriconi et al. (US 6,158,010) and Bains et al. (US 5,579,222).

Claims 2-4, 11-18 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Cohen et al. (US 6,178,511 B1) and Moriconi et al. (US 6,158,010) and Bains as applied to claim 1 above and further in view of Ferguson et al. (US 2002/0082818 A1).

Claims 5-9 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Cohen et al. (US 6,178,511 B1), Moriconi et al. (US 6,158,010), Bains and Ferguson et al. (US 2002/0082818 A1) as applied to claim 4 above and further in view of Gavrilu et al. (US 2002/0026592 A1).

Claims 19-24 and 26-38 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Cohen et al. (US 6,178,511 B1) in view of Moriconi et al. (US 6,158,010), Bains, Ferguson et al. (US 2002/0082818 A1) and Gavrilu et al. (US 2002/0026592 A1).

Claim 39 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Cohen et al. (US 6,178,511 B1) in view of Moriconi et al. (US 6,158,010), Bains and Gavrilu et al. (US 2002/0026592 A1).

Claims 40-42 and 44-51 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Cohen et al. (US 6,178,511 B1), Moriconi et al. (US 6,158,010) Bains and Gavrilu et al. (US 2002/0026592 A1) as applied to claim 39 above, and further in view of Ferguson et al. (US 2002/0082818 A1).

Claim 52 and 53 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Cohen et al. (US 6,178,511 B1) and Moriconi et al. (US 6,158,010) and Bains as applied to claim 1 above, and further in view of Franklin et al. (US 2001/0023440 A1).

Claims 1, similarly claims 19 and 39, has been amended to recite “the database user authorization comprising a user role associated with a collection of locally defined roles and associated users, wherein the user role in the central directory assigns user privileges to the user as defined by the locally defined roles contained within the user role” (emphasis added).

None of the cited references teach or suggest the feature of centralized management of user roles but allowing for decentralized definition of those user roles based upon the specific requirements of the local database systems. Specifically, none of the cited references teach or suggest “the user role in the central directory assigns the user privileges to the associated users as defined by the locally defined roles contained within the user role at the central directory.” Specifically, in an embodiment, for example, user roles, or enterprise roles, are privileges that are locally defined but centrally administered at the central LDAP directory, and the user roles centrally assign these privileges to the associated users at the central LDAP directory.

Bains does not teach or suggest at least the feature of the centralized management of user roles with decentralized definition of those user roles because Bain does not centrally assign privileges using locally defined roles. Bains teaches receiving licenses from a centralized location and the local system provides the policy to administer the licensed term of the software product. The licenses of Bains are from a centrally located license servers, not locally defined. Furthermore, those servers do not assign any user privileges to users. The granting of privileges to users is controlled by the local policy servers of the local systems. Therefore, Bains teaches a decentralized management of the policy rules and not any centralized management of user roles with decentralized definition of those user roles. Thus, Bains does not teach or suggest “the database user authorization comprising a user role associated with a collection of locally defined

roles and associated users, wherein the user role in the central directory assigns user privileges to the user as defined by the locally defined roles contained within the user role” (emphasis added).

Moriconi also does not teach or suggest at least at least the feature of the centralized management of user roles with decentralized definition of those user roles. Moriconi discloses in column 5, lines 47-55: “The present invention includes a system and method for managing and enforcing complex security requirements in a distributed computer network, and comprises a policy manager located on a server for managing and distributing a policy to a client, and an application guard located on the client, the application guard acting to grant or deny access to various components of the client, as specified by the policy.”

Moriconi teaches that a centralized policy manager provides the client policy to the clients. The clients with their application guards locally apply the client policy rules from the centralized policy manager to control access as specified by the policy. Therefore, Moriconi teaches defining the policy rules centrally and locally controlling access at the client. In other words, Moriconi teaches centrally defining and locally managing the privileges of the user. This is the opposite of centralized management of user roles with decentralized definition of those user roles. As stated above, the claimed invention centrally manages and locally defines. For example, in an embodiment, the user role centrally authorizes and assigns local privileges to a user, where the local privileges are defined locally at a local database network node. Thus, Moriconi does not teach or suggest at least the feature of “the database user authorization comprising a user role associated with a collection of locally defined roles and associated users, wherein the user role in the central directory assigns user privileges to the user as defined by the locally defined roles contained within the user role” (emphasis added).

Cohen, Franklin, and Gavrilu are not used by the Office action to show database user authorization comprising a user role associated with a collection of locally defined roles and associated users, wherein the user role in the central directory assigns user privileges to the user as defined by the locally defined roles contained within the user role, and therefore, fail to make up the deficiencies present in Moriconi.

Moreover, none of the cited prior art teaches or suggests the newly added feature of a shared schema for a database authorization. In an embodiment, for example, the shared schema that is a schema is accessible by a plurality of users and the plurality of users are mapped to the

shared schema on the local database network node such that the plurality of users do not need their own accounts on the local database network node.

Since none of the cited references disclose or suggest the above features, they cannot be combined to form the resulting subject matter of claims 1, 19, and 39. For at least the foregoing reason, claims 1, 19, and 39, and their respective dependent claims, are believed allowable over the cited references and their combination.

The teachings of the references are not sufficient to render the claims prima facie obvious.

Moreover, there is no suggestion to combine the Moriconi with Bains. Moriconi explicitly disclose that localized policy rules are undesirable (i.e., column 2, lines 44-55.) Moriconi explicitly teaches in column 2, lines 44-55, that it is undesirable to. Moriconi uses centralized policy management. A person of ordinary person skill in the art at the time of the invention would not combine Moriconi with Bains to allow for localized policy management because Moriconi clearly shows the undesirability of localized policy rules. Therefore, there is no suggestion to combine Moriconi with Bains. It is impermissible for the examiner to use hindsight reasoning to combine references (See MPEP 2141.01). Thus, the combination is improper.

MPEP 2143.01(v) states that “THE PROPOSED MODIFICATION CANNOT RENDER THE PRIOR ART UNSATISFACTORY FOR ITS INTENDED PURPOSE.” Specifically, “If proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).”

The purpose of Moriconi is to use centralized policy management to avoid the problems of localized policy rules (i.e., column 2, lines 44-55). The Office action suggests modifying the teachings of Moriconi with Bains by modifying Moriconi to include local policy rules at the client/local level. However, modification to Moriconi to locate the policy rules at a local client location would render Moriconi unsatisfactory for its intended purpose of avoiding the problems of localized policy rules. Therefore, modifying Moriconi to include localized policy rules would

render Moriconi unsatisfactory for its purpose of simplifying and preventing delay in writing operations. Thus, there is no suggestion or motivation to combine Moriconi with Bains.

MPEP 2143.01 (VI) states that “THE PROPOSED MODIFICATION CANNOT CHANGE THE PRINCIPLE OF OPERATION OF A REFERENCE.” Specifically, “If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. In *re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959).”

Similar to the reasoning above, the suggest modification to Moriconi would also change the principle of operation to Moriconi. The Office action suggests modifying the teachings of Moriconi with Bains. However, modification to Moriconi to include localized policy rules would change the principle of operation of Moriconi of avoiding the problems of localized policy rules (i.e., column 2, lines 44-55). The Office action suggests modifying the teachings of Moriconi with Bains by modifying Moriconi to include local policy rules at the client/local level. However, modification to Moriconi to locate the policy rules at a local client location would change the principle of operation of Moriconi of avoiding the problems of localized policy rules. Therefore, modifying Moriconi with localized policy rules would change the principle of operation of Moriconi. Thus, there is no suggestion or motivation to combine these references.

For at least these reasons, Applicants respectfully request that the rejections be withdrawn.

Moreover, Bains teaches away from centralized management of policies. Specifically, Bains explicitly teach the undesirability of centralized management of licenses such as NetLS or metering software because if the server or the network fails, then the workstation loaded with the software product cannot run the software product. Moreover, with the metering package running on a license server, a failure of the server or the network would prevent all software applications from running anywhere on the network. Therefore, Bains teaches the undesirability of centralized management of licenses and teaches away from centralized management. Thus, there is no motivation to combine Moriconi with Bains.

**CONCLUSION**

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

To the extent that any arguments and disclaimers were presented to distinguish prior art, or for other reasons substantially related to patentability, during the prosecution of any and all parent and related application(s)/patent(s), Applicant(s) hereby explicitly retracts and rescinds any and all such arguments and disclaimers, and respectfully requests that the Examiner re-visit the prior art that such arguments and disclaimers were made to avoid.

The Commissioner is authorized to charge Vista IP Law Group LLP Account No. **50-1105**, referencing billing number **OID-2000-083-01** for any fees required that are not covered, in whole or in part, and to credit any overpayments to said Deposit Account No. **50-1105**, referencing billing number **OID-2000-083-01**.

Respectfully submitted,

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